REMARKS

This Application has been carefully reviewed in light of the Final Office Action. Applicants appreciate the Examiner's consideration of the Application. In order to advance prosecution of this Application, Applicants have responded to each notation by the Examiner. Applicants respectfully request reconsideration and favorable action in this case.

Section 103 Rejection

The Examiner rejects Claims 1-34 under 35 U.S.C. § 103(a) over a single reference U.S. Patent No. 5,699,310 to Garloff et al. ("*Garloff*") as modified by the Examiner. Applicants respectfully traverse this rejection for the reasons discussed below.

Applicants respectfully submit that *Garloff* as modified by the Examiner fails to disclose, teach, or suggest the elements specifically recited in Claims 1-34. For example, *Garloff* fails to disclose, teach, or suggest the following elements recited in independent Claim 1:

> accessing a plurality of domain rules for a military theory, each domain rule being invariant, the plurality of domain rules comprising a plurality of military theory domain rules setting an objective to destroy an enemy's combat forces;
>
> displaying a plurality of business rules for the military theory, each business rule being variable, the plurality of business rules comprising a plurality of rules of engagement;
>
> ...
>
> associating the one or more rules of engagement with a procedure;
>
> ...
>
> generating a code corresponding to the procedure in order to design a computer program.

The Examiner equates generation rules with "a plurality of military theory domain rules setting an objective to destroy an enemy's combat forces." (Final Office Action, pp. 3, 5.) According to *Garloff*:

> The Generation Knowledge Base contains the rules and directions ***for generating source code*** from the specifications.

(*Garloff*, col. 3, lines 45-47, emphasis added.) The *Garloff* generation rules for generating source code, however, fail to disclose, teach, or suggest "a plurality of military theory domain rules setting an objective to destroy an enemy's combat forces" of Claim 1. In fact, according to Claim 1, code is generated for a procedure associated with the military theory

domain rules, so the military theory domain rules ***themselves*** are not rules for generating code. Moreover, there is no teaching, suggestion, or motivation to modify the generation rules to disclose, teach, or suggest "a plurality of military theory domain rules setting an objective to destroy an enemy's combat forces" of Claim 1.

As another example, *Garloff* fails to disclose, teach, or suggest the following elements recited in independent Claim 1:

> customizing the one or more rules of engagement.

The Examiner points to Figure 3 of *Garloff* to teach this element. (Final Office Action, p. 6.) Figure 3 of *Garloff*, however, discloses changing a list of knowledge bases:

> FIG. 3 is a flow chart of the process used to ***change the list of Knowledge Bases***. When multiple Knowledge Bases are used, they are logically concatenated to form a single, large concatenated Knowledge Base, as in the example shown in FIG. 16. When the Knowledge Bases are searched for an object, the Private Knowledge Base is searched first. Succeeding Knowledge Bases are then searched in order shown until the object is found. The Private Knowledge Base is used for all specification additions and changes. All other Knowledge Bases are designated as "Shared" and may be accessed by other members of a development group. When an object is opened from a Shared Knowledge Base, it is automatically registered as "Checked Out" in the source Shared Knowledge Base until the Developer "Checks In" the object. This structure provides a flexible means of supporting large development groups.

(*Garloff*, col. 9, lines 32-47, emphasis added.) That is, Figure 3 of *Garloff* discloses changing a list of knowledge bases, but fails to disclose, teach, or suggest customizing a rule, much less "customizing the one or more rules of engagement" of Claim 1.

As another example, *Garloff* fails to disclose, teach, or suggest the following elements recited in independent Claim 21:

> accessing a plurality of military theory rules for a military theory;
>
> ...
>
> designating the other military theory rules as a plurality of business rules of the military theory, the business rules comprising a plurality of rules engagement, each business rule being variable.

As discussed above, *Garloff* fails to disclose, teach, or suggest military theory domain rules. Accordingly, *Garloff* fails to disclose, teach, or suggest the above elements.

As another example, *Garloff* fails to disclose, teach, or suggest the following elements recited in independent Claim 21:

> accessing a plurality of legislated laws associated with the military theory;
>
> identifying military theory rules required by the laws as a plurality of domain rules of the military theory, each domain rule being invariant.

The Examiner points to the Inheritance Engine of Figure 1B of *Garloff* and Figure 3 of *Garloff* to teach "identifying military theory rules required by the laws as a plurality of domain rules of the military theory, each domain rule being invariant." (Final Office Action, p. 10.) As discussed above, Figure 3 of *Garloff* merely discloses changing a list of knowledge bases. Moreover, the Inheritance Engine of Figure 1B of *Garloff* merely changes the class of an object according to its target environment:

> The Inheritance Engine can change the class of an object according to its target environment, e.g., the target language and database. This ability allows the Generator to generate different code for different targets.

(*Garloff*, col. 9, lines 64-67.) That is, *Garloff* merely discloses changing a list of knowledge bases and changing the class of an object according to its target environment, but fails to disclose, teach, or suggest "accessing a plurality of legislated laws associated with the military theory" or even "identifying military theory rules required by the laws as a plurality of domain rules of the military theory, each domain rule being invariant" of Claim 1.

For at least these reasons, independent Claims 1 and 21 and their dependent claims are allowable under 35 U.S.C. § 103. For analogous reasons, independent Claims 7, 13, 19, 20, 25, 29, 33, and 34 and their respective dependent claims are allowable under 35 U.S.C. § 103. Accordingly, Applicants respectfully request reconsideration and allowance of all pending claims

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Keiko Ichiye, the Attorney for Applicants, at the Examiner's convenience at (214) 953-6494.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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